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9 UNITED STATES DISTRICT COURT

10 EASTERN DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA AND STATE  
12 OF CALIFORNIA ex rel. GAIL JOSEPH, M.D.,

13 Plaintiff,

14 v.

15 P. GILL OBSTETRICS & GYNECOLOGY  
16 MEDICAL GROUP, INC., a California  
17 professional corporation; PARAMPAL K. GILL,  
18 M.D., an individual; JASBIR S. GILL, M.D., an  
19 individual,

20 Defendants.

Case No. 2:21-CV-00554-DAD-AC

**JOINT NOTICE REGARDING  
SETTLEMENT AND REQUEST TO  
RETAIN JURISDICTION; ORDER**

1 Plaintiff and Relator GAIL JOSEPH, M.D, and Defendants P. GILL OBSTETRICS &  
2 GYNECOLOGY MEDICAL GROUP, INC., PARAMPAL K. GILL, M.D., and JASBIR S.  
3 GILL, M.D., (hereafter the Parties), by and through their counsel of record, hereby notify the  
4 Court that the Parties as well as the UNITED STATES OF AMERICA and the STATE OF  
5 CALIFORNIA have reached a settlement in the above-entitled matter. The Parties hereby request  
6 that the Court vacate all pending due dates and hearings and retain jurisdiction over this case until  
7 Defendant can fully perform its duties as required under the settlement agreement. It is estimated  
8 that Defendant will fully perform its duties on or around June 26, 2024. Upon Defendant's  
9 completion of its duties (as mandated under the settlement agreement) and within two weeks after  
10 said completion, Defendant will file with this Court a joint notice of dismissal with prejudice to  
11 be signed by counsel for all Parties as well as the UNITED STATES OF AMERICA and the  
12 STATE OF CALIFORNIA  
13  
14

15  
16 Respectfully submitted,

17 Dated: March 28, 2024

18 STOEL RIVES LLP

19 By: /s/ Matthew D. Segal  
20 MATTHEW D. SEGAL  
21 WHITNEY A. BROWN  
22 Attorneys for Defendants  
P. Gill Obstetrics & Gynecology Medical  
Group, Inc.; Parampal K. Gill, M.D.;  
Jasbir S. Gill, M.D.

23 Dated: March 28, 2024

24 THE BRINEGAR LAW FIRM

25 By: /s/ Matthew A. Brinegar  
26 MATTHEW BRINEGAR  
27 Attorneys for Relator/Plaintiff  
28 Gail Joseph, M.D.

**ORDER**

Pursuant to the foregoing Stipulation, and good cause appearing, all dates and hearings are hereby vacated, and the Court will retain jurisdiction over this matter for one hundred- and twenty-days' time to allow for Defendant to fulfill its duties under the settlement agreement.

**IT IS SO ORDERED.**

DATED: \_\_\_\_\_, \_\_\_\_\_ 2024

\_\_\_\_\_  
UNITED STATES DISTRICT JUDGE

**CERTIFICATE OF SERVICE**

I hereby certify that on the 28<sup>th</sup> day of March 2024, I caused to be electronically filed and served the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

Matthew Segal, Esq.  
STOEL RIVES LLP  
500 Capitol Mall, Suite 1600  
Sacramento, CA 95814  
[matthew.segal@stoel.com](mailto:matthew.segal@stoel.com)

Dated: March 28, 2024

THE BRINEGAR LAW FIRM

By: /s/ Matthew Brinegar  
MATTHEW BRINEGAR  
Attorneys for Relator/Plaintiff  
Gail Joseph, M.D.